

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR 18-0092-RAJ
)	
Plaintiff,)	
)	DEFENSE STATUS HEARING
v.)	MEMORANDUM
)	
BERNARD ROSS HANSEN, and)	
DIANE RENEE ERDMANN,)	
)	
Defendants.)	

A status hearing is scheduled for tomorrow, Tuesday, August 13, 2019 because new counsel for Diane Erdmann filed a conditional notice of appearance, making clear that counsel would require at least six months from the current trial date to prepare for trial. Dkt. 101. Counsel for Mr. Hansen submits this memorandum to address the scheduling issues that will arise at the hearing.

If Ms. Erdmann's request for a trial continuance is granted, Mr. Hansen has no objection to continuing his trial date as well. He is prepared to execute a speedy trial waiver to accommodate a continuance. A motion to sever the defendants has not been filed by any of the parties.

If the trial date is continued, the scheduling order for Mr. Hansen should be modified to reflect the new trial date. Thus far, Mr. Hansen has disclosed an expert, filed pretrial motions,

1 and a witness list. Assuming a continuance is granted, it makes little sense to have bifurcated
2 litigation tracks leading up to trial.

3 If a new scheduling order is granted, counsel will work with the government and new
4 counsel to propose an amended scheduling order that resets deadlines for answering briefs and
5 hearing dates for Mr. Hansen's pending motions, firm dates for pretrial motions related to Ms.
6 Erdmann, notice of expert witnesses for Ms. Erdmann, and those dates remaining for both Mr.
7 Hansen and Ms. Erdmann, i.e., disclosure of *Jencks*, questionnaires, motions in limine, trial
8 briefs, and jury instructions, with status conferences at regular intervals to monitor progress.

9 DATED this 12th day of August, 2019.

10 Respectfully submitted,

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12 *s/ Dennis Carroll*

13 *s/ Jennifer E. Wellman*

14 Attorneys for Bernard Ross Hansen
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CERTIFICATE OF SERVICE

I certify that on August 12, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of filing to Assistant U.S. Attorneys Benjamin Diggs and Brian Werner and attorney Barry Flegenheimer.

/s/ Barbara Hughes
Paralegal